BEFORE THE FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of the Wireline Competition)	
Bureau Seeking Comment on a Petition)	DA 07-1846
By the State E-Rate Coordinators Alliance)	
For Clarification and/or Waiver of E-Rate)	CC Docket No. 02-6
Rules Concerning Technology Plan)	
Creation and Approval Under the Schools)	
And Libraries Universal Service Support`)	
Mechanism.		

Comments of Robert L. Anderson, Superintendent Fort Benton Public Schools Fort Benton, Montana

May 11, 2007

The Fort Benton Public Schools, 1820 Washington, P.O. Box 399, Fort Benton, Montana 59624, files these comments in support of the petition of the State E-rate Coordinators Alliance (SECA) for clarification and/or waiver of E-rate rules concerning technology plan creation and approval under the Schools and Libraries Universal Service support mechanism.

Fort Benton Public School District No. 1 serves a rural area in north central Montana. Fort Benton, the birthplace of Montana, is located on the Missouri River. Fort Benton is a small, rural community. Our District school buses transport students to and from school from homes as distant as 45 miles. District No. 1 geographically has a radius of approx 50 road miles. Its 350 students (total K-12) have a one to one ratio of computers to students. Technology is fully integrated into nearly every facet of the curriculum, both academically and vocationally.

I wish to go on record as in support of the State E-rate Coordinators Alliance (SECA) recommendations with regard to a clarification to an interpretation of FCC rules by the Schools and Libraries Division of USAC. SECA has outlined an approach that would work for school districts and the Schools & Libraries Division in the filing of form 470 and eliminate the cart before the horse situation evidenced by the recent determinations of USAC regarding technology plans.

The use of E-Rate funding is an advantageous educational factor for teachers and students in our school district, just the same as the use of a current and meaningful Technology Plan. Like most schools in our state, our technology planning is an ongoing and evolving process. We continually make modifications to our technology plan that best suit our student and staff

needs. We file our technology plans with the State Education office for review and approval on a multi-year basis as determined by the State. As always, we fully intend to comply with our Montana State requirements and with those of USAC; however, USAC's recent interpretations related to technology plans have resulted in a disjointed situation that fails to recognize state-specific needs and practices in the State Education technology plan approval process.

Please carefully consider SECA's remedy, which I believe will work for all school districts. Montana school districts have been an advocate of the E-Rate Program since its inception and have worked very hard to comply with all laws and rules associated with the Program. Our common goal has been to provide our students with access to telecommunications comparable to that provided to students in the urban areas of our Nation. The E-Rate Program has helped us provide a high quality technology environment for staff and students in nearly every school district in Montana.

We urge the Federal Communications Commission to respond favorably to the State E-rate Coordinators Alliance (SECA) recommendations. We should not forget the intent of Congress when it included the E-Rate Program in the Telecommunications Act of 1996. Rather, we must continue to work together as partners to ensure that all schools and libraries continue to have access to telecommunications.

RESPECTFULLY SUMBITTED This 11^h day of May, 2007

Robert L. Anderson, Superintendent Fort Benton Public Schools Fort Benton, Montana